

TRINITY TEACH ENGLISH ONLINE PRIVACY STATEMENT FOR COURSE PARTICIPANTS

1. Introduction

This Privacy Statement forms part of the Trinity Teach English Online ('Trinity Teach') Terms of Use and Terms and Conditions of Booking and provides information about the different types of personal information that Trinity College London ("Trinity", "we", "us") collects about you, the ways in which we use it and your data protection rights, including a right to object to some of the processing which we carry out.

It applies to all those who visit our [Trinity Teach Site](#) (the "Site"), and interact with us online in connection with this Site ("you"), including Trinity Teach students and tutors.

The Site is not intended for use by individuals under 18 years of age.

2. Our role

Trinity is the **data controller** in respect of any personal information we collect from and about you. As a data controller, we are committed to protecting your privacy at all times in accordance with all applicable laws and regulations governing the use or processing of personal data, including (where applicable) the General Data Protection Regulation (EU) 2016/679 ("UK GDPR"), the Data Protection Act 2018 any and subsequent data protection legislation which is in force in the UK at the relevant time.

3. When and what personal information do we collect?

Information you give to us directly

We will collect certain personal information from and about you when you interact with us. For example, when you sign up for one of our Teach English Online Self-Study Unit(s)/Modules(s); complete an online form on our Site or when you respond to one of our surveys. This may include:

- Your full name and contact details, including email address, postal address, telephone number;
- Profile information if you register on our Site;
- Your gender, educational history, date of birth and any special needs requests;
- Image, video and/or voice recordings;
- Your first language & country where you live;
- Your user name and password;
- Any communications with us or the Site;
- Information about your communication preferences;
- Payment information, when you make a payment through our Site(s);
- For tutors, the content (including the recordings) you are sharing with students;
- The name of your employer/business

Information we obtain automatically about you

We automatically collect the following information about your visits to our Site:

- the Internet address (or IP address) of the device you used to access the Site;
- whether you reached the Sites using a search engine or if you clicked a link on another website;
- the type of web browser you used; and
- the type of device you used to access the Internet.

We use this data for administrative and statistical purposes as well as to help us improve our Site. More information about the technical information we collect about your visits to our Sites and the purposes for which we collect it can be found in our [Cookie Policy](#).

Information we receive from third parties

Sometimes, we also receive information about you from schools, universities or third parties who are registering for our Self-Study Unit(s)/Modules on your behalf. This information may include:

- Your full name and contact details, including email address, postal address, telephone number;
- Your gender, educational history, date of birth and any special needs requests; and
- Your first language & country where you live;

In order to deliver our Trinity Teach courses, the provision of your name, user name and password is mandatory: for the Qualification, you must also provide your address and date of birth. If relevant personal information is not provided, then we will not be able to provide your course(s) and/or Qualification. All other provision of your information is optional.

4. How we use your personal information and our lawful basis for processing

We may use your personal information for one or more of the following purposes:

To fulfil a contract, or take steps linked to a contract: this is relevant where you have registered for one of our courses or events, created an account or have otherwise entered into a contract with us. This includes:

- dealing with your enquiries and requests or those made on your behalf by anyone who booked your Self-Study Unit(s)/Modules
- fulfilling an order you make to purchase any products from us;
- providing booking services when you register for our events;
- providing you access to downloadable support resources (if available on the relevant Site);
- verifying and carrying out financial transactions in relation to payments made by you; and
- issuing you with an e-certificate when you complete a Self-Study Unit/Module

As required to conduct our business, administer our services and pursue our legitimate interests, in particular:

- providing, improving and personalising our services and our Site;
- providing you with information and news about our online content, products and programmes of event and inviting you to participate in surveys (where we do not need consent to do so);
- retaining a record of incoming and outgoing communications (e.g. email, telephone call, online chat). Information in the communications we receive and send will not be disclosed to any third party without the permission of the sender unless otherwise in accordance with the applicable data protection laws
- administering registered user records;
- administering our online forums (when such functionality is available on our Site);
- monitoring malpractice and preventing fraud or misuse of service;
- dealing with complaints and appeals;
- for quality assurance and training purposes as well as using aggregated data for academic and research purposes to improve and develop our products and services;
- using data in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation);
- to further our charitable aim in general.

Where you give us your consent:

- we provide you with information and news about our online content, products and programmes of events, such as our syllabuses, publications, webinars/workshops or conferences (where consent required by applicable law);
- we invite you to participate in marketing and academic surveys;
- we use cookies and similar technologies in accordance with our [Cookie Policy](#) and the information provided to you when those technologies are used;
- on other occasions where we ask you for consent, we will use the personal information for the purpose which we explain at that time.

For purposes which are required by law:

- in response to requests by government or law enforcement authorities conducting an investigation.
- to satisfy legal obligations which are binding on us (e.g. to comply with our obligation to provide reasonable adjustments to candidates with disability).

In some cases, we can rely on multiple legal bases for one purpose of processing. The above classification indicates the main legal basis we are normally relying upon to process your data for a specific purpose, but this is not necessarily the only legal basis we can rely on for the purposes listed.

For the data processing based on our legitimate interests described above, you can obtain information on any of our balancing tests by contacting us using the details set out later in this notice.

If you are resident in India, and for the purposes of Indian data protection laws, you consent to us processing your personal data to allow us to fulfil contracts, to conduct our business and further our legitimate interests, for purposes required by law, and for the other purposes detailed above. In addition, you consent to us sharing and transferring your personal data in accordance with Sections 5 and 7 below.

You may withdraw this consent at any time in accordance with Section 6. Please note that in such cases, you may not be able to access the Site or have access to certain features of the Site.

5. Sharing your Personal Data

We will share the personal information we collect from you:

- with course tutors and selected business partners with whom we work in conjunction with the Site to deliver the online courses such as, Northpass (online learning platform), Shopify (our ecommerce platform and point of sale), academic researchers and market research companies.
- Where necessary for delivering the content of the online Self-Study Unit(s)/Modules(s) to you or where a third party registered on your behalf we will also share your personal information with your employer, school, college or university
- We also share this information with our other companies in our group such as our subsidiaries where they are providing support services to us
- Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws
- We may also disclose your personal information to selected other third-party processors (such as agents and our suppliers) but only in connection with our own processing purposes, as outlined above. This includes:
 - the service providers we use to host data on their servers;
 - the service providers we engage to provide support services such as providers of video conferencing services, event scheduling services, learner management system, IT support, payment services;
 - our marketing automation tool service providers, for the purpose of managing email lists and issuing communications on our behalf.

We reserve the right to disclose your personal information to third parties:

- If we buy or sell any business or assets or most of our assets are acquired by a third party, in which case we will disclose your personal information to the prospective buyer or seller;
- for auditing purposes where we employ chartered accountants;
- if we are under any legal or regulatory obligation to do so (for example as required by our regulators, eg Ofqual, or the Information Commissioner's Office);
- in connection with any legal proceedings or prospective legal proceedings.

6. Your rights

Under certain circumstances, by law, you have the right to:

- (a) **Request access** to your personal information (by a "data subject access request"). This enables you to receive a confirmation from us as to whether we process any of your personal information or not, and if this is the case, to receive a copy of such personal information and to check that we are lawfully processing it.
- (b) **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- (c) **Request erasure** of your personal information (often referred to as "the right to be forgotten").
- (d) **Object to the processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- (e) **Request the restriction of processing** of your personal information.
- (f) **Request the transfer** of your personal information to another party.
- (g) **Withdraw your consent** where we rely on it to process your personal information although in some cases, we may have other legal grounds for processing your data for other purposes, such as those set out in this policy. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests.

Marketing Communications and Your rights

Trinity College London operates a strict 'opt-in' policy for individuals. That means we will not send you any information unless you have requested to receive e-mail/text/social media message updates from us. You can withdraw your consent at any time as set out above.

For legal entities, such as companies, limited liability partnerships and other incorporated organisations, Trinity College London operates, in compliance with the relevant data protection laws, an 'opt-out' policy. This means that we will continue to contact such businesses with news and information of our goods and services until we are informed that this communication is no longer required.

You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by clicking on the unsubscribe link in the relevant email or message or by emailing us at unsubscribe@trinitycollege.com. Once this information is received we will remove you from our direct marketing database.

The above rights may be limited in some instances, for example if fulfilling your request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the UK GDPR and in the Data Protection Act 2018. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights, or to obtain other information, such as a copy of a legitimate interests balancing test, you can get in touch with us by contacting our Data Protection Officer using the details set out below. If you have unresolved concerns, you have the right to complain to a UK or EU data protection authority where you are based or where you believe a breach may have occurred. In the UK this is the Information Commissioner's Office (the "ICO").

7. International data transfers

It is possible that personal information we collect from you will be transferred to and stored in a location outside your country of residence.

Where information is transferred outside the UK or the EEA, and where this is to a partner or vendor in a country that is not subject to an adequacy decision by the EU Commission (e.g. USA, India, China and Canada), we have put in place appropriate transfer mechanisms under Articles 46 to 49 of the UK GDPR. This includes protecting the transfer of personal information by EU Commission approved standard contractual clauses or a vendor's Processor Binding Corporate Rules. If you have any questions about the transfer of your personal information or would like to obtain a copy of the relevant transfer mechanism, please contact us.

8. How long do we keep your personal information?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements and for the length of time set out in our [Data Retention Schedule](#). For example, we will normally keep your name and contact details where you have signed up to a course for 6 years and then they are deleted. In making our retention decision we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. Contact us

Please contact us if you have any questions about this privacy policy or the information we hold about you. If you wish to contact us, please contact:

M Phillips
The Data Protection Officer (also the Grievance Officer for Indian Data Protection law purposes)
Trinity Teach
Trinity College London
dpo@trinitycollege.com

10. Changes to this Privacy Statement

We may update this Privacy Statement from time to time and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your Personal Information.

11. Cookie Policy

We use and allow our partners to use cookies and similar technologies on our Site in order to collect information that helps us to remember your preferences, analyse your use of the Site, personalise your content and improve your user experience and to allow you to interact with social media]. When we talk about cookies in this Privacy Statement, we also mean these similar technologies. Cookies may be set by the website you are visiting ('first party cookies') or they may be set by other websites who run content on the page you are viewing ('third party cookies'). For further information on the cookies we use, their purposes and the partners with who we share your information, please see our [Cookie Policy](#).

Document Owner and Approval

The Data Protection Officer is the owner of this document and is responsible for ensuring that this document is reviewed in line with the review requirements.

Effective date: 19 October 2021

Date of next review: 19 October 2022